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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,) No.
)
Plaintiff,) <u>COUNT 1:</u>
) CONSPIRACY TO COMMIT BANK
vs.) FRAUD, WIRE FRAUD, AND MAIL
) FRAUD
VALERIE JOLYN CRUZ CALIP and) Vio. of 18 U.S.C. § 1349
JENNIFER KATHLEEN HAYDU,)
) <u>COUNTS 2-6:</u>
Defendants.) BANK FRAUD
) Vio. of 18 U.S.C. § 1344(2)
)
) <u>COUNTS 7-10:</u>
) WIRE FRAUD
) Vio. of 18 U.S.C. § 1343
)
) <u>COUNTS 11-14:</u>
) MAIL FRAUD
) Vio. of 18 U.S.C. § 1341
)
) <u>COUNTS 15-20:</u>
) AGGRAVATED IDENTITY THEFT
) Vio. of 18 U.S.C. § 1028A
)
)

-) COUNT 21:
 -) CONSPIRACY TO COMMIT MONEY
 -) LAUNDERING
 -) Vio. of 18 U.S.C. §§ 1956(h) and
 -) 1956(a)(1)(B)(i)
 -)
 -) COUNTS 22-24:
 -) MONEY LAUNDERING
 -) Vio. of 18 U.S.C. § 1956(a)(1)(B)(i)
 -)
 -) CRIMINAL FORFEITURE
 -) ALLEGATION:
 -) Vio. of 18 U.S.C. § 982(a)(2)(A) and
 -) (B), and R. 32.2, Fed. R. Crim. P.
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INDICTMENT

The Grand Jury charges that:

1. At all times relevant to this Indictment, Wells Fargo Bank was a federally chartered financial institutions, the deposits of which were insured by the Federal Deposit Insurance Corporation.

2. At all times relevant to this Indictment, Alaska USA Federal Credit Union (“Alaska USA”) and True North Federal Credit Union (“True North”) were federally chartered financial institution, the deposits of which were insured by the National Credit Union Administration.

COUNT 1

(Conspiracy to Commit Bank Fraud, Wire Fraud, and Mail Fraud)

THE CONSPIRACY

3. The allegations above are realleged and incorporated as if fully set forth in this count.

4. Beginning on a date unknown to the Grand Jury, but no later than October 2021, and continuing until at least December 2022, within the District of Alaska and elsewhere, defendants VALERIE JOLYN CRUZ CALIP and JENNIFER KATHLEEN HAYDU, together with others known and unknown to the Grand Jury, combined, conspired, and agreed with each other to commit certain offenses defined under Title 18, United States Code, Chapter 63, to wit: Bank Fraud, in violation of 18 U.S.C. § 1344(2), Wire Fraud, in violation of 18 U.S.C. § 1343, and Mail Fraud, in violation of 18 U.S.C. § 1341.

OBJECT OF THE CONSPIRACY

5. The object of the conspiracy was to knowingly and with intent to defraud, devise, execute, and attempt to execute a scheme to obtain monies, funds, assets, and other property owned by and in the custody and control of federally insured financial institutions, to wit, Alaska USA Federal Credit Union (“Alaska USA”), True North Federal Credit Union, and Wells Fargo (the “victim banks”), by means of materially false and fraudulent pretenses, representations, and promises; and to devise and execute through the use of the United States mails and wires in interstate commerce, a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and by concealment of material facts.

THE MANNER AND MEANS OF THE CONSPIRACY

6. In furtherance of this conspiracy, and to accomplish its object, the following manners and means were used, among others:

7. CALIP and HAYDU and others would steal mail, checkbooks, drivers' licenses, and other identity documents from victims' cars or other locations in Alaska or elsewhere, and intercept mail from banks belonging to victims. CALIP and HAYDU would then copy or alter the divers' licenses and identity documents to include their own photographs, with the original owner's personal information. CALIP and HAYDU would also fraudulently alter the stolen checks, and would create false and fraudulent powers of attorney documents claiming to have a power of attorney over the victims.

8. CALIP and HAYDU would then sign up for credit cards or bank accounts using the victims' names and other personal information, but change the mail delivery address to the U.S. Post Office at 800 Ingra Street, Anchorage, AK, 99501. CALIP and HAYDU would also at times change the mail delivery addresses for victims' preexisting bank accounts to the U.S. Post Office at 800 Ingra Street.

9. CALIP and HAYDU would then enter the U.S. Post Office at 800 Ingra Street and present the false identification documents they previously created in order to pick up the victims' bank statements, credit cards, and other financial documents and mailings.

10. Once in control of the victims' banking and credit cards, CALIP and HAYDU would enter financial institutions and present the false identification documents in order to make withdrawals from the victims' accounts, or to deposit fraudulent checks into the victims' accounts for later withdrawal.

11. CALIP and HAYDU sought to conceal the illegal scheme, including by creating fraudulent online accounts with cash transfer apps, such as "Cash App," "Current,"

or “Square,” in the names of victims, and would transfer money directly out of the victims’ bank accounts, or would deposit cash into their “Green Dot” or “Current” accounts, and would transfer that money to third-party accounts in order to disguise the source and location of the funds.

12. Through the scheme, CALIP and HAYDU stole more than 200 identity documents from victims and fraudulently obtained a total of at least \$150,000 from Alaska USA and other federally insured banking institutions, to which CALIP and HAYDU knew they were not entitled.

OVERT ACTS

13. In furtherance of the conspiracy and to effect its illegal object, CALIP and HAYDU committed the following overt acts, among others:

OA1: On or about October 25, 2021, defendants CALIP and HAYDU cashed a stolen and fraudulent \$700 check drawn from J.L.’s Wells Fargo account ending in 4746, in the name of “Jennifer Haxdu,” and an \$820 stolen and fraudulent check drawn from J.L.’s Wells Fargo account ending in 1448, in the name of “L.S.”

OA2: On or about August 30, 2021, defendant CALIP attempted to cash a fraudulent \$494.00 check drawn from O.A.R. Corp.’s Wells Fargo account ending in 2141, by presenting a fraudulent Alaska Driver’s License bearing J.F.’s name and signature.

OA3: Between in or about November 2021 and February 2022, CALIP and HAYDU entered the U.S. Post Office at 800 Inga Street in Anchorage, AK, and obtained

mail addressed to J.F. by presenting a fraudulent Alaska Driver's License bearing CALIP's photograph, but J.F.'s name.

OA4: On or about January 15, 2022, CALIP and HAYDU opened a Choice Financial Group credit card in the name of J.F.

OA5: On or about January 17, 2022, defendant CALIP withdrew \$4,000 cash from J.F.'s Alaska USA account ending in 8447, by presenting a fraudulent identification card in the name of L.S., and a fraudulent document purporting to grant L.S. power of attorney over J.F.

OA6: On or about January 21, 2022, CALIP deposited a fraudulent \$12,000 check drawn from the Village of Wainwright's Wells Fargo Bank account ending in 0057, into J.F.'s Alaska USA account ending in 8447.

OA7: On or about January 24, 2022, defendant CALIP withdrew \$8,000 cash from J.F.'s Alaska USA account ending in 8447.

OA8: On February 6, 2022, CALIP opened Alaska USA bank account ending in 3026 in the name of L.S. by falsely signing and certifying that she was L.S. on the Alaska USA application form, and obtained a \$5,000 line of credit.

OA9: Between on or about February 6, 2022, until on or about February 16, 2022, CALIP and HAYDU executed multiple Square/Cash App transfers from Alaska USA account ending in 3026 in the name of L.S., into the Square/Cash App account in the name of "Jennifer H," in order to conceal and disguise the nature and source of the funds.

OA10: Between on or about January 6, 2022, until on or about February 12, 2022, CALIP and HAYDU executed multiple Square/Cash App transfers from an account

fraudulently created in the name of J.F., to an account in the name of “Jennifer Haydu,” in order to conceal and disguise the nature and source of the funds.

OA11: On or about May 16, 2022, CALIP entered Payless Car Sales in Anchorage, AK, and attempted to apply for a vehicle loan and purchase a vehicle by presenting a fraudulent Illinois Driver’s License bearing CALIP’s photograph, but L.S.’s name and signature.

OA12: On or about June 7, 2022, defendant CALIP entered the True North Federal Credit Union in Anchorage, AK, and opened a new bank account ending in 879 in the name of J.J., by presenting a fraudulent Alaska Driver’s License bearing CALIP’s photograph, but J.J.’s name and signature. CALIP then deposited two fraudulent checks in the amounts of \$2,763.58 and \$2,314.87 into True North account ending in 879, and withdrew \$1,700 cash.

OA13: Between on or about October 28, 2022, through on or about November 8, 2022, defendant HAYDU withdrew a total of \$9,600 dollars from the Habitat for Humanity Wells Fargo account ending in 1017, by presenting a fraudulent Alaska Driver’s License bearing HAYDU’s photograph, but L.G.’s name and other personal information.

OA14: Between on or about June 3, 2022, through on or about November 2, 2022, HAYDU executed multiple Cash App transfers totaling \$3,015.66 to CALIP into an account created in the name of J.J., in order to conceal and disguise the nature and source of the funds.

COUNTS 2-6
(Bank Fraud)

14. The allegations above are realleged and incorporated as if fully set forth in this count.

THE SCHEME TO DEFRAUD

15. Beginning on a date unknown to the Grand Jury, and continuing until at least January 2021, within the District of Alaska and elsewhere, defendants VALERIE JOLYN CRUZ CALIP and JENNIFER KATHLEEN HAYDU, and others known and unknown to the Grand Jury, each aiding and abetting the others, knowingly and with intent to defraud, devised, executed, and attempted to execute a scheme to obtain monies, funds, assets, and other property owned by and in the custody and control of Alaska USA, True North, and Wells Fargo (the “victim banks,”) by means of materially false and fraudulent pretenses, representations, and promises.

16. The fraudulent scheme was operated and carried out, in substance, as set forth in paragraphs 6-12 of this Indictment.

17. On or about the dates set forth below, defendants CALIP and HAYDU, committed and willfully caused others to commit the following acts, each of which constituted an execution and attempted execution of the fraudulent scheme and constitutes a separate and distinct count of this Indictment:

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COUNT	DEFENDANT(s)	DATE(S)	ACT
2	CALIP HAYDU	August 30, 2021	CALIP attempted to cash a fraudulent \$494.00 check drawn from Wells Fargo account ending in 2141, by presenting a fraudulent Alaska Driver's License bearing J.F.'s name and signature.
3	CALIP HAYDU	January 17, 2022	CALIP withdrew \$4,000 cash from J.F.'s Alaska USA account ending in 8447, by presenting a fraudulent identification card in the name of L.S., and a fraudulent document purporting to grant L.S. power of attorney over J.F.
4	CALIP HAYDU	February 6, 2022	CALIP opened Alaska USA bank account ending in 3026 in the name of L.S. by falsely signing and certifying that she was L.S. on the Alaska USA application form, and obtained a \$5,000 line of credit.
5	CALIP HAYDU	June 7, 2022	CALIP opened a True North bank account ending in 879 in the name of J.J., by presenting a fraudulent Alaska Driver's License bearing CALIP's photograph, but J.J.'s name and signature. CALIP then deposited two fraudulent checks in the amounts of \$2,763.58 and \$2,314.87 into True North account ending in 879, and withdrew \$1,700 cash.
6	CALIP HAYDU	October 28, 2022 through November 8, 2022	HAYDU withdrew a total of \$9,600 dollars from Wells Fargo account ending in 1017 owned by Habitat for Humanity, by presenting a fraudulent ID card with HAYDU's photograph, but L.G.'s name and personal information.

All of which is in violation of 18 U.S.C. § 1344(2).

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COUNTS 7-10
(Wire Fraud)

18. The allegations above are realleged and incorporated as if fully set forth in this count.

THE SCHEME TO DEFRAUD

19. On or about the dates set forth in the separate counts below, within the District of Alaska and elsewhere, defendants VALERIE JOLYN CRUZ CALIP and JENNIFER KATHLEEN HAYDU, did knowingly, and with intent to defraud, devise and intend to devise a scheme and artifice to defraud as to a material matter and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and by concealment of material facts.

20. The fraudulent scheme was operated and carried out, in substance, as set forth in paragraphs 6-12 of this Indictment.

21. For the purpose of executing such scheme and artifice and attempting to do so, CALIP and HAYDU did transmit and cause to be transmitted, by means of wire communication in interstate commerce, certain writings, signs and signals, namely:

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COUNT	DEFENDANT	DATES	WIRE TRANSACTION
7	CALIP HAYDU	August 30, 2021	CALIP caused a communication via interstate wires by attempting to cash a fraudulent \$494 check at Alaska USA
8	CALIP HAYDU	January 21, 2022	CALIP and HAYDU caused a communication via interstate wires between Wells Fargo Bank and Alaska USA
9	CALIP HAYDU	February 6, 2022	CALIP caused a communication via interstate wires by obtaining a \$5,000 line of credit from Alaska USA.
10	CALIP HAYDU	June 7, 2022	CALIP caused a communication via interstate wires by depositing two fraudulent checks in the amounts of \$2,763.58 and \$2,314.87 at True North.

All of which is in violation of 18 U.S.C. § 1343.

COUNTS 11-14
(Mail Fraud)

22. The allegations above are realleged and incorporated as if fully set forth in this count.

23. Beginning on a date unknown to the Grand Jury, but no later than October 2021, and continuing until at least February 2022, within the District of Alaska and elsewhere, defendants VALERIE JOLYN CRUZ CALIP and JENNIFER KATHLEEN HAYDU, knowingly having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of materially false and fraudulent pretenses, representations and promises, and concealment of material facts, did cause to be delivered certain mail matter by the United States Postal Service and by private or

commercial interstate carrier, and did take and receive mail from any United States Post Office for the purpose of executing such scheme and artifice.

24. The fraudulent scheme was operated and carried out, in substance, as set forth in paragraphs 6-12 of this Indictment.

25. On or about the dates set forth below, defendants CALIP and HAYDU, committed and willfully caused others to commit the following acts, each of which constituted an execution and attempted execution of the fraudulent scheme and constitutes a separate and distinct count of this Indictment:

COUNT	DEFENDANT	DATES SENT	DESCRIPTION OF MAILING
11	CALIP HAYDU	April 8, 2022	Verizon Visa Card statement for March 9 – April 8, 2022 for \$3,982.55
12	CALIP HAYDU	March 15, 2022	FinCo Services, Inc. Check to J.F. for \$3,998.03 sent by bill.com
13	CALIP HAYDU	March 11, 2022	Embrace Pet Insurance Cancellation for J.F. with email haydujen1@gmail.com
14	CALIP HAYDU	November 1, 2022	Charles Schwab contact information update for L.G.

All of which is in violation of 18 U.S.C. § 1341.

COUNT 15

26. On or about August 30, 2021, within the District of Alaska and elsewhere, defendants, VALERIE JOLYN CRUZ CALIP and JENNIFER KATHLEEN HAYDU, knowingly possessed and used, without lawful authority, a means of identification that defendants CALIP and HAYDU knew belonged to another person, to wit: the name and

signature and fraudulent Alaska Driver's License of victim J.F., during and in relation to the offense of Conspiracy to Commit Bank Fraud, Wire Fraud, and Mail Fraud, a felony violation of 18 U.S.C. § 1349, as charged in Count One of this Indictment.

All of which is in violation of 18 U.S.C. § 1028A.

COUNT 16

27. On or about January 17, 2022, within the District of Alaska and elsewhere, defendants, VALERIE JOLYN CRUZ CALIP and JENNIFER KATHLEEN HAYDU, knowingly possessed and used, without lawful authority, a means of identification that defendants CALIP and HAYDU knew belonged to another person, to wit: a fraudulent identification card bearing the name L.S. and a fraudulent power of attorney document in the name of L.S. using L.S.'s signature, during and in relation to the offense of Conspiracy to Commit Bank Fraud, Wire Fraud, and Mail Fraud, a felony violation of 18 U.S.C. § 1349, as charged in Count One of this Indictment.

All of which is in violation of 18 U.S.C. § 1028A.

COUNT 17

28. Between in or about November 2021, through in or about February 2022, within the District of Alaska and elsewhere, defendants, VALERIE JOLYN CRUZ CALIP, JENNIFER KATHLEEN HAYDU, knowingly possessed and used, without lawful authority, a means of identification that defendant CALIP and HAYDU knew belonged to another person, to wit: a fraudulent Alaska Driver's License bearing CALIP's photograph, but J.F.'s name and signature, during and in relation to the offense of Conspiracy to

Commit Bank Fraud, Wire Fraud, and Mail Fraud, a felony violation of 18 U.S.C. § 1349, as charged in Count One of this Indictment.

All of which is in violation of 18 U.S.C. § 1028A.

COUNT 18

29. On or about February 6, 2022, within the District of Alaska and elsewhere, defendants, VALERIE JOLYN CRUZ CALIP and JENNIFER KATHLEEN HAYDU, knowingly possessed and used, without lawful authority, a means of identification that defendants CALIP and HAYDU knew belonged to another person, to wit: the name and signature of L.S. on an Alaska USA application form, during and in relation to the offense of Conspiracy to Commit Bank Fraud, Wire Fraud, and Mail Fraud, a felony violation of 18 U.S.C. § 1349, as charged in Count One of this Indictment.

All of which is in violation of 18 U.S.C. § 1028A.

COUNT 19

30. On or about June 7, 2022, within the District of Alaska and elsewhere, defendants, VALERIE JOLYN CRUZ CALIP and JENNIFER KATHLEEN HAYDU, knowingly possessed and used, without lawful authority, a means of identification that defendants CALIP and HAYDU knew belonged to another person, to wit: a fraudulent Alaska Driver's License bearing CALIP's photograph, but J.J.'s name and signature, during and in relation to the offense of Conspiracy to Commit Bank Fraud, Wire Fraud, and Mail Fraud, a felony violation of 18 U.S.C. § 1349, as charged in Count One of this Indictment.

All of which is in violation of 18 U.S.C. § 1028A.

COUNT 20

31. On or about October 28, 2022, through on or about November 8, 2022, within the District of Alaska and elsewhere, defendants, VALERIE JOLYN CRUZ CALIP and JENNIFER KATHLEEN HAYDU, knowingly possessed and used, without lawful authority, a means of identification that defendants CALIP and HAYDU knew belonged to another person, to wit: a fraudulent Alaska Driver's License bearing HAYDU's photograph, but L.G.'s name and other personal information, during and in relation to the offense of Conspiracy to Commit Bank Fraud, Wire Fraud, and Mail Fraud, a felony violation of 18 U.S.C. § 1349, as charged in Count One of this Indictment.

All of which is in violation of 18 U.S.C. § 1028A.

COUNT 21

32. The allegations above are realleged and incorporated as if fully set forth in this count.

33. Beginning on a date unknown to the Grand Jury, but no later than October 2021, and continuing until at least December 2022, within the District of Alaska and elsewhere, defendants VALERIE JOLYN CRUZ CALIP and JENNIFER KATHLEEN HAYDU willfully and knowingly conspired and agreed together and with each other, and with others known and unknown to the Grand Jury, to commit certain offenses under 18 U.S.C. § 1956, to wit: to knowingly conduct and attempt to conduct a financial transaction affecting interstate commerce, which transaction involved the proceeds of specified unlawful activity, that is, Conspiracy to Commit Bank Fraud, Wire Fraud, and Mail Fraud, in violation of 18 U.S.C. § 1349, knowing that each of the transactions was designed in

whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of such specified unlawful activity.

All of which is in violation of 18 U.S.C. § 1956(h).

COUNTS 22-24

34. The allegations above are realleged and incorporated as if fully set forth in this count.

35. On or about the dates set forth below, within the District of Alaska and elsewhere, the defendants, VALERIE JOLYN CRUZ CALIP and JENNIFER KATHLEEN HAYDU, knowing that the property involved in each of the financial transactions set forth below represented the proceeds of some form of unlawful activity, knowingly conducted, attempted to conduct, and willfully caused to be conducted, the below financial transactions affecting interstate commerce, which transactions, in fact, involved the proceeds of specified unlawful activity, namely, Conspiracy to commit Bank Fraud, Wire Fraud, and Mail Fraud, in violation of 18 U.S.C. § 1349, knowing that each of the transactions was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of such specified unlawful activity, with each financial transaction constituting a separate and distinct count of this Indictment as to the defendants set forth below:

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COUNT	DEFENDANT	TRANSACTION DATE	AMOUNT	FINANCIAL TRANSACTION
22	CALIP HAYDU	January 6, 2022, through February 12, 2022	\$1,363	Multiple electronic transfers by Calip from account created in the name of J.F., to Jennifer Haydu, via Square/Cash App
23	CALIP HAYDU	February 16, 2022	\$1,050	Multiple electronic transfers by Calip from Alaska USA account ending in 3026 created in the name of J.S., to “Jennifer H.,” via Cash App
24	CALIP HAYDU	June 3, 2022, to November 2, 2022	\$3,015.66	Multiple electronic transfers by Haydu to Calip into account created in the name of J.J., via Cash App.

All of which is in violation of 18 U.S.C. § 1956(a)(1)(B)(i).

CRIMINAL FORFEITURE ALLEGATION

36. The allegations set forth in Counts 1 through 24 are incorporated herein by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 982(a)(2)(A) and (B).

37. Pursuant to Federal Rule of Criminal Procedure 32.2, notice is hereby given to the above-named defendants that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. § 982(a)(2)(A) and (B), and 28 U.S.C. § 2461(c), including but not limited to all property, real or personal, which constitutes or is derived from proceeds traceable to a conspiracy to commit bank fraud, bank fraud, or aggravated identity theft, as charged in this Indictment.

All pursuant to 18 U.S.C. § 982(a)(2)(A) and (B), and Federal Rule of Criminal
Procedure 32.2.

A TRUE BILL.

s/ Grandy Jury Foreperson
GRAND JURY FOREPERSON

s/ Ryan D. Tansey
RYAN D. TANSEY
Assistant U.S. Attorney
United States of America

s/ S. Lane Tucker
S. LANE TUCKER
United States Attorney
United States of America

DATE: 1-18-23